

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-CV11829 GAO

ROBERT S. STEPHENS,
Plaintiff

V.

ROBERT MULHERN, individually
and as Police Chief of the Town of
Groton,
PETER S. CUNNINGHAM,
individually and as a Selectman for
the Town of Groton,
THOMAS D. HARTNETT individually
and as a Selectman of the Town of
Groton,
DANN CHAMBERLIN, individually
and as a Selectman of the Town
of Groton,
"JOHN DOE" and
THE TOWN OF GROTON,
Defendants.

**THE DEFENDANTS ROBERT MULHERN, PETER S. CUNNINGHAM,
THOMAS D. HARTNETT, DANN CHAMBERLIN, "JOHN DOE" and THE
TOWN OF GROTON, DISCLOSURE IN ACCORDANCE FOR THE
FEDERAL RULE OF CIVIL PROCEDURE 26**

The Defendants Robert Mulhern, Peter S. Cunningham, Thomas D. Hartnett, Dann Chamberlin, "John Doe" and The Town of Groton provide the following information pursuant to the initial disclosure provisions of local 26.2 and Federal Rules of Civil Procedure 26(a).

26(a)(1)(A). Individuals likely to have discoverable information relative to the incidents as described in the Plaintiff's Complaint.

Trooper Brian C. Gavoli, Massachusetts State Police, Firearms Identification Section. 59 Horse Pond Road, Sudbury, MA.

Patrolman Irmin Pierce, Groton Police Department.

Robert Mulhern, Police Chief, Town of Groton.

Peter S. Cunningham, Selectman, Town of Groton.

Dann Chamberlin, Selectman, Town of Groton.

Thomas Hartnett, Selectman, Town of Groton.

Robert Stephens, 382B West Main Street, Groton, MA.

Sean K. Ramsay, Groton Police Department.

Lt. John Saball, Groton Police Department.

John F. Rooney, Groton Police Department.

Sgt. Catherine A. Glejzer, Groton Police Department.

Paul E. Nutile, 991 Mason Road, Ashby, MA

Joseph A. Nutile, 54 Hill Road, Groton, MA

Robert Decilio, 366 West Main Street, Groton, MA

Draughon Wells, 382 West Main Street, Groton, MA.

Keeper of Records Groton Police Department.

Carl Majeskey, 122 Morgan Driver, Haverhill, MA

The Defendants reserve the right to supplement this list as more information becomes available to them.

26(a)(1)(b). Description by category and location of all documents that are relevant to the disputed facts alleged with particularity in the pleadings:

Subject to objection, to Production of Documents based on work prior to attorney-client privilege, the following categories of documents will be valued with this initial disclosure or at the Offices of Brody, Hardoon, Perkins & Kesten LLP, One Exeter Plaza, Boston, MA 02116:

1. The Defendants currently have no documents in their possession, custody or control.

The Defendants reserve the right to supplement this list as more information becomes available to them.

Paragraph 26(a)(1)(c). Computation of any category of damages claimed by the disposing party:

1. Not applicable.

Paragraph 26(a)(1)(d). Insurance.

Available upon request.

Respectfully submitted,
THE DEFENDANTS,
Robert Mulhern,
Peter S. Cunningham,
Thomas D. Hartnett,
Dann Chamberlin,
"John Doe" and
The Town of Groton,
By their attorneys,

/s/ Jeremy I. Silverfine
Jeremy Silverfine, BBO No. 542779
Leonard H. Kesten, BBO No. 542042
BRODY, HARDOON, PERKINS & KESTEN
One Exeter Plaza
Boston, MA 02116
(617) 880-7100

Dated: 10/8/04